



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 22, 2021

BY ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: *United States v. Isabella Pollok*, S1 20 Cr. 110 (LJL)

Dear Judge Liman:

The Government writes in response to defendant Isabella Pollok's motion to suppress statements to law enforcement, filed on November 19, 2021. (Dkt. 252). The Government has determined that it will not seek to introduce these statements against Pollok in its case-in-chief. Because Pollok's statements were not coerced or involuntary, the Government reserves the right to use her statements for impeachment purposes. *See, e.g., United States v. Douglas*, 525 F.3d 225, 248 (2d Cir. 2008); *United States v. Siddiqui*, 699 F.3d 690, 706-07 (2d Cir. 2012), *as amended* (Nov. 15, 2012) ("[T]he government may introduce un-Mirandized statements to impeach the defendant's testimony.").

Respectfully submitted,

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